

Weil, Gotshal & Manges LLP

767 Fifth Avenue
New York, NY 10153-0119
+1 212 310 8000 tel
+1 212 310 8007 fax

BY ECF

July 3, 2014

Jonathan D. Polkes
+1 (212) 310-8881
jonathan.polkes@weil.com

Hon. Ronald L. Ellis
United States District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Veleron Holding, B.V. v. Morgan Stanley, et al., No. 12-cv-5966 (S.D.N.Y.)

Dear Judge Ellis:

We write on behalf of the Morgan Stanley Defendants in response to the July 3, 2014 letter filed by Plaintiff Veleron Holding, B.V. (“Veleron”). Enclosed with this letter are Veleron’s privilege logs and related materials. Exhibit A is Veleron’s privilege log of documents withheld in full; Exhibit B is Veleron’s privilege log of documents produced with redactions; and Exhibit C is a legend for the privilege logs. We did not include these items with our previous submissions because they total more than 500 pages, but in light of Veleron’s July 3 letter, we enclose them now. The sheer breadth of the privilege logs illustrate the volume of material Veleron is improperly shielding from discovery. Indeed, all six entries on the very first page of Exhibit A are just a few examples of documents withheld purportedly on the basis of an asserted (but nonexistent) privilege by a Russian in-house lawyer.

Respectfully submitted,

/s/ Jonathan D. Polkes

Jonathan D. Polkes

cc: All counsel (by ECF)